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12 **IN THE UNITED STATES DISTRICT COURT**
13 **FOR THE DISTRICT OF ARIZONA**

14 Don Addington; *et al*,
15 *Plaintiffs,*
16 vs.
17 US Airline Pilots Ass'n; and US Airways,
18 Inc.,
19 *Defendants.*

CASE NO. 2:13-CV-00471-ROS
**STIPULATION FOR ADDITIONAL
TIME FOR APPLICATION FOR
ATTORNEYS' FEES AND COSTS**

20 Plaintiffs previously requested [Doc. 333] and this Court granted [Doc. 337] them
21 until November 20, 2015 to file their application for attorneys' fees and costs with
22 support therefor. Plaintiffs' counsel have been working diligently on the application.
23 The firm Polsinelli was the lead, and for many years the only, firm handling the
24 *Addington* matters for the West Pilots. This Court may recall that all but one of the
25 attorneys who worked at Polsinelli have left. Only one attorney from the West Pilots'
26 lead firm, Jennifer Axel, remains at Polsinelli. Unfortunately, Ms. Axel was recently ill
27 and unable to work for several days, and was therefore unable to work with the
28 accounting department at Polsinelli to finalize the billing information needed to complete
29 Plaintiffs' application.

30 Counsel undersigned consulted with counsel for USAPA to inform them about this
31 issue and the challenges it has presented, and counsel for USAPA have graciously agreed

1 to stipulate to additional time for Plaintiffs to complete their application and its
2 supporting materials.

3 Plaintiffs, therefore, respectfully ask the Court to enter an order allowing them until
4 Wednesday, December 2, 2015, to file their LRCiv. 54.2 fee application.

5 A proposed order is attached as an exhibit and is provided to chambers in Word
6 format.

7 Respectfully submitted this 19th day of November, 2015.

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/s/ Kelly J. Flood

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CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2015, I electronically filed the foregoing with the Clerk of the Court and electronically served a copy of the same upon all parties by using the CM/ECF system. In addition, I transmitted the foregoing via email and US Mail Service to the following:

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